

UNITED STATES BANKRUPTCY COURT

DISTRICT OF SOUTH CAROLINA

IN RE:)	
)	B/K Case No: 22-02775-EG
SABRINA P. DENNIS XXX-XX-8528)	
(Sabrina Pearson Dennis))	Chapter 13
1240 SUMNER AVENUE)	
CHARLESTON, SC 29406)	
)	
Debtor.)	

MOTION TO RECONSIDER

Sabrina P. Dennis, (hereinafter referred to as the "Debtor"), by and through her undersigned attorney, hereby moves this Court pursuant to Rule 60(b) of the Federal Rules of Civil Procedure, made applicable to this bankruptcy proceeding through Bankruptcy Rule 9024, to reconsider its Order of Dismissal. The Debtor is informed and believe that cause exists which would allow this Court to reconsider this Order and allege as follows:

1. The Debtor filed for Chapter 13 relief on October 12, 2022.
2. The Debtor's Amended Chapter 13 plan, which provides for payments \$1,825 per month payable over 60 months, was confirmed on February 6, 2023.
3. Beginning in May 2023, the Debtor fell behind in her plan payments and in response to the Trustee's Motion to Dismiss her case, entered into a consent Order which would have brought her case current.
4. Notwithstanding the fact that the Debtor had the funds, she had misunderstood when her cure payments were due and as a result, had made payments in an amount less than as required under the terms of the settlement agreement.
4. As a result, the Trustee requested that the case be dismissed, which was granted on October 2, 2023.
5. The Debtor has the funds available to immediately reinstate by bringing the plan current. Further, she now better understands the process and insuring that she has properly set up the payments to be auto-debited from her account through TFS bill pay.
6. The Debtor believes that adequate cause exists to grant the relief requested. As the Trustee was making both her house and car payments through her

plan, the reinstatement of the case is necessary to allow her to retain possession of those essential assets.

WHEREFORE, the Debtor prays that this Court reconsider its Order of Dismissal and allow the Debtor to continue in Chapter 13; and for such other and further relief this Court deems just and equitable.

Respectfully submitted,

CAMPBELL LAW FIRM, P.A.

/s/ Michael Conrady
MICHAEL H. CONRADY
Attorney for the Debtor
Post Office Box 684
Mt. Pleasant, S.C. 29465
(843) 884-6874/884-0997(fax)
District Court I.D. No. 5560
mconrady@campbell-law-firm.com

Mt. Pleasant, South Carolina
This 10 day of October, 2023.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF SOUTH CAROLINA

IN RE:

SABRINA P. DENNIS XXX-XX-8528
(Sabrina Pearson Dennis)
1240 SUMNER AVENUE
CHARLESTON, SC 29406

Debtor.

B/K Case No: 22-02775-EG

Chapter 13

CERTIFICATE OF MAILING

I, Michael Conrady of the Campbell Law Firm, P.A. hereby certify that on this day

I mailed a true and correct copy of the following:

NOTICE AND MOTION TO RECONSIDER

by mailing said copies by First Class United States mail and Certified mail, with proper postage affixed thereto and addressed to the following parties and those listed on the attached mailing matrix:

/s/ Michael Conrady
MICHAEL H. CONRADY
Campbell Law Firm, PA
Post Office Box 684
Mt. Pleasant, SC 29465
(843) 884-6874/ (843) 884-0997 fax

Mt. Pleasant, South Carolina
Dated: October 10, 2023

Label Matrix for local noticing
0420-2
Case 22-02775-eg
District of South Carolina
Charleston
Tue Oct 10 10:45:00 EDT 2023

(p)AUTOMONEY INC
ATTN ABIGAIL SCUDDER DUFFY
450 MEETING ST
CHARLESTON SC 29403-5522

Bank of America
100 N Tryon St
Charlotte NC 28202-4036

Bank of America, N.A.
Care Of Cooling & Winter, LLC
220 North Main Street, Suite 500
Greenville SC 29601-2129

Brock and Scott
3800 Fernandina Road, Suite 110
Columbia SC 29210-3838

Capital Accounts
Attn: Bankruptcy
Po Box 140065
Nashville TN 37214-0065

Cavalry SPV I, LLC
PO Box 4252
Greenwich, CT 06831-0405

Michael Conrady
Campbell Law Firm, PA
PO Box 684
Mt. Pleasant, SC 29465-0684

(p)SOUTHERN MANAGEMENT
PO BOX 1947
GREENVILLE SC 29602-1947

Credit Collection Services
Po Box 607
Norwood MA 02062-0607

Debt Recovery Solution
Attn: Bankruptcy
6800 Jericho Turnpike Suite 113e
Syosset NY 11791-4401

Sabrina P. Dennis
1240 Sumner Avenue
Charleston, SC 29406-3822

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Kevin Corley
P.O. Box 287
Columbia SC 29202-0287

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Travis E. Menk
Brock & Scott, PLLC
3825 Forrestgate Dr.
Winston-Salem, NC 27103-2930

Midland Funding, LLC
Attn: Bankruptcy
Po Box 939069
San Diego CA 92193-9069

Midnight Velvet
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Midnight Velvet/Swiss Colony
Attn: Bankruptcy
1112 Seventh Ave
Monroe WI 53566-1364

Monroe & Main
Attn: Bankruptcy
1112 7th Avenue
Monroe WI 53566-1364

Monroe & Main
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

NetCredit
175 W Jackson Blvd
Suite 1000
Chicago, IL 60604-2863

NetCredit
Attn: Bankruptcy
175 W. Jackson Blvd, Ste 1000
Chicago IL 60604-2863

Quantum3 Group LLC as agent for
Velocity Investments LLC
PO Box 788
Kirkland, WA 98083-0788

RISE Credit
Attn: Bankruptcy
Po Box 101808
Fort Worth TX 76185-1808

(p)PERITUS PORTFOLIO SERVICES II LLC
P O BOX 141419
IRVING TX 75014-1419

South Carolina Department of Revenue
300A Outlet Pointe Blvd.
Columbia SC 29210-5666

South Carolina FCU
P.o. Box 190012
N. Charleston SC 29419-9012

Synchrony Bank by AIS InfoSource, LP as
agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

Synchrony Bank by AIS InfoSource, LP as agen
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

Synchrony Bank/Sams
Attn: Bankruptcy
Po Box 965060
Orlando FL 32896-5060

US Trustee's Office
Strom Thurmond Federal Building
1835 Assembly Street
Suite 953
Columbia, SC 29201-2448

Wells Fargo Bank, N.A.
3476 Stateview Blvd
Fort Mill, SC 29715-7200

Wells Fargo Bank, N.A.
Default Document Processing
MAC# N9286-01Y
P.O. Box 1629
Minneapolis MN 55440-1629

Wells Fargo Bank, N.A., Wells Fargo Card Ser
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Wells Fargo Hm Mortgag
Po Box 10335
Des Moines IA 50306-0335

Wylie Westmoreland Clarkson
P.O. Box 287
Columbia SC 29202-0287

James M. Wyman
PO Box 997
Mount Pleasant, SC 29465-0997

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Auto Money
3720 Rivers Ave
Charleston SC 29406

Covington Credit/smc
Attn: Bankruptcy
Po Box 1947
Greenville SC 29602

Internal Revenue Service
Centralized Insolvency Operation
Post Office Box 21126
Philadelphia PA 19114

RISE Credit
Peritus Portfolio Services II, LLC
PO BOX 141419
IRVING, TX 75014-1419

End of Label Matrix	
Mailable recipients	37
Bypassed recipients	0
Total	37